

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**INVENTOR HOLDINGS, LLC,**

**Plaintiff,**

**v.**

**KMART CORPORATION, SEARS,  
ROEBUCK & COMPANY and SEARS  
HOLDINGS MANAGEMENT  
CORPORATION,**

**Defendants.**

**CASE NO. 1:14-cv-185 GMS**

**(CONSOLIDATED)**

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**INVENTOR HOLDINGS, LLC,**

**Plaintiff,**

**v.**

**BED BATH & BEYOND INC.,**

**Defendant.**

**CASE NO. 1:14-cv-448-GMS**

**DEFENDANTS' MOTION FOR JUDGMENT ON THE PLEADINGS**

Pursuant to D. Del. LR 7.1.2, Defendants Kmart Corporation, Sears, Roebuck & Company, Sears Holdings Management Corporation, and Bed Bath & Beyond Inc. (collectively, "Defendants") hereby move for judgment on the pleadings pursuant to Federal Rule of Civil Procedure 12(c) and request this Court dismiss Plaintiff Inventor Holdings LLC's Complaint for failure to state a claim upon which relief can be granted.

The grounds for this motion are further set forth in the Defendants' Opening Brief in Support of their Motion for Judgment on the Pleadings, which is being filed contemporaneously herewith.

Dated: February 6, 2015

Respectfully submitted,

By: /s/ Jeremy D. Anderson

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ROEBUCK & COMPANY, SEARS  
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**[PROPOSED] ORDER GRANTING DEFENDANTS’  
MOTION FOR JUDGMENT ON THE PLEADINGS**

Having considered Defendants Kmart Corporation, Sears, Roebuck & Company, Sears Holdings Management Corporation, and Bed Bath & Beyond Inc.’s (collectively, “Defendants”) Motion for Judgment on the Pleadings,

IT IS HEREBY ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2015, that the Motion is GRANTED.

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Honorable Gregory M. Sleet